

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**CITY OF SYRACUSE, NY, *et al.*,**

**Plaintiffs,**

**v.**

**BUREAU OF ALCOHOL, TOBACCO,  
FIREARMS AND EXPLOSIVES, *et al.*,**

**Defendants.**

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**CASE NO. 1:20-cv-06885-GHW**

**Oral Argument Requested**

**NOTICE OF MOTION OF  
INTERVENOR POLYMER80, INC.**

PLEASE TAKE NOTICE that, pursuant to Rule 56 of the Federal Rules of Civil Procedure, Intervenor Polymer80, Inc. (“Polymer80”) respectfully moves this Court for summary judgment (“Motion”) on the Second, Third, and Fourth Claims For Relief in the Complaint For Declaratory And Injunctive Relief in the above-captioned action, ECF Doc. 11, which Claims essentially seek the invalidation of three determination letters, as unlawful and arbitrary and capricious, issued to Polymer80 by defendant Bureau of Alcohol, Tobacco, Firearms and Explosives. In support of its Motion, Polymer80 relies upon the accompanying Memorandum of Law, with exhibits; its Local Civil Rule 56.1 Statements Of Material Facts On Motion For Summary Judgment; and any argument and evidence presented at the hearing of this Motion.

Dated: New York, New York  
April 15, 2021

Respectfully submitted,

/s/ James J. McGuire

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